

RECEIVED

DEC 21 2010

CLERK  
U.S. DISTRICT COURT  
MINNEAPOLIS, MINNESOTA

UNITED STATES DISTRICT COURT

DISTRICT OF MINNESOTA

ELIZABETH ANN MANNING (FORMERLY  
CORRIVEAU)

Plaintiff

Case No. \_\_\_\_\_

Vs

SA CHALLENGER, INC.

BERNICK, LIFSON, GREENSTEIN, GREENE & LISZT, P.A.

SARAH KRANS BERNICK, LIFSON, GREENSTEIN, GREENE &  
LISZT, P.A.

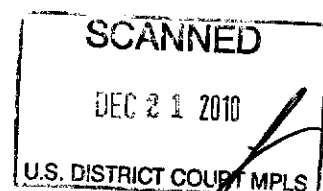
DEMAND FOR JURY TRIAL

YES

Defendants

ACTION TO QUIET TITLE

COMES NOW, ELIZABETH MANNING (FORMERLY CORRIVEAU) Plaintiff to Quiet the Title of certain real property within the State of Minnesota, and to Complain of the Defendants for various violations of the Federal Truth in Lending Act, Real Estate Settlement Procedures Act, Home Equity Ownership Protection Act, Fair Debt Collection Procedures Act and others, and for good cause would show the Court the following:



PARTIES

1. Plaintiff ELIZABETH NANNING, FORMERLY CORRIVEAU is an individual, living in Minnesota, who can be served process at 7001 171ST AVE NW RANSEY, MN. 55303.
2. Defendant SA CHALLENGER, INC., a corporation located at 800 NICOLLET MALL 21ST FLOOR, BC-MN-H210, MPLS. MN. 55402
3. Defendant BERNICK, LIPSON, GREENSTEIN, GREENE & LUSZT, PA a professional corporation located at THE COLONIADE, SUITE 1200 5500 WYAZATA BLVD. MPLS, MN 55416

JURISDICTION

Basis for federal court jurisdiction is namely federal question by defendants' violation of Federal Truth in Lending Act.

Basis for venue in the District of Minnesota:

Plaintiff resides in Minnesota

Facts alleged below primarily occurred in Minnesota

STATE OF THE CLAIM

This claim is brought forth due to the Defendants' entirely ignoring the Plaintiffs valid correspondence, and illegally and fraudulently foreclosing on Plaintiff. Plaintiff seeks cancellation of this foreclosure, production of requested documents and documented proof, rescission of this fraudulent and predatory loan, break in the assignment of Mortgage, and monetary and statutory damages for Defendants' multiple violations of laws.

FACTS

Fact 1- I am the Plaintiff in this matter. I have direct knowledge of all the facts set forth in this complaint.

Fact 2- Plaintiff entered into an agreement for a mortgage in August of 2003 with ABN AMRO mortgage group.

Fact 3- The loan is allegedly owned by SA Challenger, Inc. as of March 2, 2010.

Fact 4- There is an undated allonge endorsement from ABN AMRO to Regency Savings Bank F.S.B. signed by William Lisnerski who is purportedly a Vice President. (Undated allonge attached as Exhibit C.)

Fact 5- Allonge endorsement dated March 1, 2010 from Park National Bank to U.S. Bank signed by Sachin Darji, who is purportedly a Vice President of U.S. Bank and purportedly the Attorney-in-Fact for the FDIC. (See Aff. 8 (asserting the the FDIC acting as receiver for Park National Bank assigned the Note to U.S.Bank).) (March 1, 2010 allonge attached as Exhibit D.)

Fact 6- Allonge endorsement dated March 2, 2010 From U.S. Bank to SA Challenger, Inc., signed by Michael D. Mason who is purportedly a "authorized signer" for U.S. Bank and is the Vice President of SA Challenger, Inc. (See Aff. 1 (asserting that Mason is the VP of Defendant).) (March 2, 2010 allonge attached as Exhibit E.)

Fact 7- The documents show a break in the negotiation of the Note between Regency Savings Bank F.S.B. and Park National Bank. The only thing in the record to resuscitate this break is a unsupported statement of Mason: "Regency Savings Bank F.S.B. is the pre-merger predecessor in interest to Park National Bank. (See Aff. 8) There is no explanation why before merging with Park National Bank, Regency Savings Bank failed to endorse the Note over to Park National Bank.

Fact 8- There is nothing in record that evidences how U.S. Bank was empowered to endorse Park National Bank's purported interest in the Note to itself. Additionally, there is nothing in the record that evidences who or what empowered Michael C. Mason to endorse U.S. Bank's purported interest in the Note to himself.

Fact 9- May 14, 2004 assignment from ABN AMRO to Regency Savings Bank F.S.B. signed by Sherry Doza who is purportedly a Vice President of ABN AMRO Mortgage, Group. (May 14, 2004 assignment attached as Exhibit F)

Fact 10- March 1, 2010 assignment from Park National Bank to U.S. Bank signed by Sachin Darji, who is purportedly a Vice President of U.S. Bank and purportedly the Attorney-in-Fact for the FDIC. (See Aff 8 (asserting that the FDIC acting as receiver for Park National Bank assigned the Note to U.S. Bank).) (March 1, 2010 allonge attached as Exhibit G.)

Fact 11- March 2, 2010 assignment U.S. Bank to SA Challenger, Inc. signed by Michael D. Mason who is purportedly a "authorized signer" for U.S. Bank and is the Vice President of SA Challenger, Inc. (See Aff. 1 (asserting that Mason is the VP of Defendant).) (March 2, 2010 assignment attached as Exhibit H.)

Fact 12- A break in the assignment of the Mortgage between Regency Savings Bank F.S.B. and Park National Bank. The only thing in the record to resuscitate this break is a unsupported statement of Mason: "Regency Savings Bank F.S.B. is the pre-merger predecessor in interest to Park National Bank. (See Aff. 8) There is no explanation why before merging with Park National Bank, Regency Savings Bank failed to assign the mortgage interest over to Park National Bank.

Fact 13- There is nothing in record that evidences how U.S. Bank was empowered to assign Park National Bank's purported interest in the Mortgage to itself. Additionally, there is nothing in the record that evidences who or what empowered Michael D. Mason to assign U.S. Bank's purported interest in the Mortgage to himself.

Fact 14- Plaintiff has not received answers to questions regarding the verification/validity of loan and Defendants' lack of standing.

CAUSE OF ACTION

Cause #1- Violations of TILA, Regulation Z.

Cause #2- Violations of Real Estate Settlement Procedures Act (RESPA)

Cause #3- Violations of SEC Regulations

Cause #4- Violations of Home Ownership and Equity Protection Act

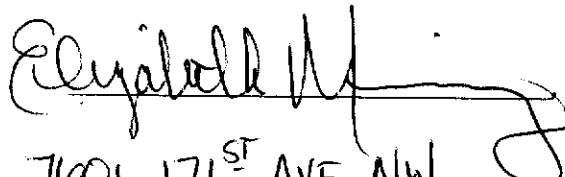
Cause #5- Violations of Fair Debt Collections Procedure Act

REQUEST FOR RELIEF

Plaintiff seeks cancellation of foreclosure sale, production of requested documents and documented proof, rescission of this fraudulent and predatory loan, and monetary and statutory damages for Defendant's multiple violations of laws, including but not limited to, the Federal Truth in Lending Act.

Plaintiff reserves the right to amend and refile, and/or amend or refile this document based on new or forthcoming, or as yet undiscovered information.

Signed this 20<sup>th</sup> day of December, 2010.

 pro se  
7601 171<sup>ST</sup> AVE NW.  
RANNEY, NM 85303  
763-250-3665